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4	Attorneys for Mark D. Waldron, Chapte	er 11 Trustee
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6	·	
7	UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF WASHINGTON	
8		
9	In re:	Case No. 18-03197 FPC 11
10	GIGA WATT, Inc., a Washington corporation,	The Honorable Frederick P. Corbit
11	Corporation,	Chapter 11
12	Debtor.	SUPPLEMENTAL DECLARATION
13		OF MARK D. WALDRON IN SUPPORT OF CHAPTER 11
14		TRUSTEE'S MOTION FOR ORDER APPROVING: (I) SALE OF TNT
15		FACILITY AND TRAILER EQUIPMENT, SUBJECT TO
16		OVERBIDDING, APPROVING NOTICE THEREON; (II)
17		ASSUMPTION AND ASSIGNMENT OF LEASES AND CONTRACT;
18		AND (III) SHORTENED NOTICE THEREON
19		Telephonic Hearing
20		Date: May 13, 2020 Time: 1:30 p.m. PT
21		Telephone: 877-402-9753 Access Code: 3001392
22		
23		
24	<u>Supp.</u> Decl. of Mark D. Waldron in Supp. of Trustee's Motion for Order Approving: (i) Sale of TNT Facility, etc.	
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I, Mark D. Waldron, declare as follows:

- 2 I submit this supplemental declaration in my official capacity as the 3 duly-appointed Chapter 11 Trustee in the bankruptcy case of the above-captioned debtor (the "Debtor" or "Giga Watt") and in support of the Chapter 11 Trustee's 4 Motion for Order Approving: (i) the Sale of the TNT Facility and Trailer 5 Equipment Free and Clear of all Liens, Claims and Interests, Subject to 7 Overbidding, Approval of Notice Thereof, (ii) the Assumption and Assignment of Leases and Power Contract, and (ii) Shortened Notice Thereon (the "Motion"). The statements set forth herein are based on my investigation of the Debtor's affairs, which is ongoing, and except where otherwise noted, are based on my 10 personal knowledge. If called as a witness, I would and could competently testify 11 12 thereto.
 - 2. Unless otherwise defined herein, capitalized terms have the meanings ascribed to them in the Motion.
 - 3. The Buyer, EcoChain, Inc., is a wholly-owned subsidiary of Mechanical Technology, Incorporated, ("MTI"). MTI is publicly-traded and is also a leading provider of test and measurement interests. MTI has entered into a joint venture with Soluna Technologies Ltd. ("Soluna"), which develops utility scale computing infrastructure for the blockchain powered by renewal energy, such as the hydroelectric power supplied by the Public Utility District No. 1, Douglas County, Washington.

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<u>Supp.</u> Decl. of Mark D. Waldron in Supp. of Trustee's Motion for Order Approving: (i) Sale of TNT Facility, etc. - Page 2

1	4. The Buyer, EcoChain, Inc., will own the TNT Facility. Soluna will	
2	provide construction and operational skill. Attached as Exhibit 1 is a press release	
3	of MTI describing its relationship with Soluna and EcoChain.	
4	5. Attached as Exhibit 2 is an article regarding a recent purchase by	
5	Hive Blockchain Technologies, Ltd. of a 30 MW cryptocurrency facility for	
6	approximately \$95,000 per MW, plus stock interests in the buyer.	
7	6. The TNT Facility runs less than 2MW and is selling for \$100,000 per	
8	MW. The Trailer Equipment is also being sold.	
9	To the best of my knowledge, I declare under penalty of perjury that the	
10	foregoing is true and correct.	
11	Executed this 4th day of May 2020 in Tacoma, Washington.	
12		
13	Mark D. Waldaw in Line CG in Line	
14	Mark D. Waldron, in his official capacity as Chapter 11 Trustee in the above-captioned case	
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24	<u>Supp.</u> Decl. of Mark D. Waldron in Supp. of Trustee's Motion for Order Approving: (i) Sale of TNT Facility, etc Page 3	

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